PETER DOUGHERTY

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United States Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: DELETE, DELETE, DELETE

Summary

The document is a formal letter addressed to the Federal Communications Commission (FCC), expressing support for GN Docket No. 25-133, issued on March 12, 2025. The author advocates for the elimination of unnecessary regulations affecting amateur radio and General Mobile Radio Service (GMRS) operations. The key points are as follows:

1. **Simplified Licensing for Amateur Radio:** The author proposes that the current licensing examinations for amateur radio are overly complex and suggests a single examination to cover essential knowledge. Additionally, the introduction of a second license class with restricted privileges for new operators is recommended.
2. **Outdated Frequency Restrictions:** The document highlights that the current frequency limits for telephony in the shortwave spectrum are burdensome and not aligned with international standards. The author suggests updating these restrictions to facilitate better communication for American amateurs.
3. **Review of Power Limitations:** The author calls for a re-evaluation of power restrictions for amateur radio operators, particularly in the 10.1 MHz band, arguing that the current 200-watt limit may hinder effective communication due to atmospheric noise.

Elimination of GMRS Licensing: The letter advocates for the removal of licensing requirements for GMRS operators, stating that enforcement is lacking and that most users do not adhere to current regulations. It also proposes merging GMRS with other frequency services to streamline operations. The document is a formal letter addressed to the Federal Communications Commission (FCC), expressing support for GN Docket No. 25-133, issued on March 12, 2025. The author advocates for the elimination of unnecessary regulations affecting amateur radio and General Mobile Radio Service (GMRS) operations.

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lacking and that most users do not adhere to current regulations. It also proposes merging GMRS with other frequency services to streamline operations.

Background

I have been a Commission licensee in the Amateur Radio service since April 2002, I am a volunteer examiner, and hold the Extra Class callsign W2IRT and GMRS callsign WRJB851. Licensed in Canada since 1979, I previously worked in the Land Mobile industry and held the Canadian equivalent of a Part 90 license before moving to the U.S.

Amateur Radio Part 97 issues

Licensing examinations have served as unnecessary gatekeepers to the amateur radio spectrum for too long. A simplified testing and licene requirement for this service is still necessary to ensure adequate knowledge of frequency and mode limits, electrical and RF safety, interference mitigation, and good operating practices. One exam, not three, could easily achieve these ends. Complex technical exams are outdated as most amateurs use commercially manufactured equipment in 2025, and have little interest in building or repairing their own gear and those that do have already been licensed for a long time. Continuing the legacy incentive licensing programs simply isn't beneficial. It costs the Commission time and money, and offers no benefit to the American taxpayer or the United States government.

But with the above said, a second license class with restricted privileges should be granted with minimal examination, allowing operation on the 144-148 and 430-450 MHz bands using only commercially-built equipment, limited to Frequency Modulation or Phase Modulation modes, and restricted to 50 Watts of RF output or less. This would meet the needs of most new applicants, based upon my experience as an examiner and an active “ham” operator.

Current shortwave spectrum mode and frequency requirements are outdated and burdensome. For instance, telephony frequency limits in the 7 MHz and 14 MHz bands impede American amateurs compared to operators in other countries. Canada allows telephony as low as 7.035 MHz, while the U.K. and most of the world permit phone operation above 7.040 MHz. American amateurs can only operate above 7.125 MHz, which is impractical given the reduced number of HF spectrum operators. Similar restrictions exist in the 14 MHz band, where Americans are confined above 14.200 MHz, unlike the global standard starting at 14.150 MHz. These restrictions no longer make sense in 2025.

The power and amplifier restrictions for American amateur radio operators are worth reconsidering. Currently, American operators have a 200-watt power limitation in the 10.1 MHz band, which may be insufficient for effective communication due to heavy atmospheric noise. Removing or at least reconsidering this unrealistic limit is therefore warranted.

Additionally, the 15dB amplifier gain restriction, originally introduced to deter unlawful high-power operation on the 27 MHz Citizens Band decades ago, continues to impact the manufacture and sale of amplifiers for the American amateur radio market. This regulation necessitates separate specifications for domestic use compared to international standards. Given that the original concern is no longer significant, these regulations might warrant reevaluation as they may not serve a practical purpose today.

General Mobile Radio Service Part 95, and itinerant Part 90 licensing

I would *strongly* recommend that the commission eliminate the need for licensing operators in the General Mobile Radio Service (GMRS). As a matter of practice, in my years as a GMRS licensee in off-road and outdoor activities nationwide, I have *never* heard one single operator of a mobile GMRS station use a callsign at all, let alone as prescribed by the current regulations. Most have never heard of the need for a license or simply do not care.

Like Citizens Band in the 1970s, licensing is simply burdensome and serves absolutely no purpose since GMRS equipment can be purchased easily and inexpensively, and there is no incentive for people to obtain licenses since there is no enforcement of these regulations whatsoever, based on the FCC's own enforcement database.

I am strongly in favor of keeping technical standards in place for Part 95 *equipment,* to prevent unlawful operation or spurious signals from these devices, but the overall need to license operators is redundant and should be abolished outright. **Delete, delete, delete**!

It has also been my experience that the GMRS is often used by small businesses, contrary to Part 95 regulations. I would therefore suggest that the General Mobile Radio Service should be merged with or should also include the common "star" and "dot" VHF and UHF land mobile "Part 90" itinerant business frequencies.[1] Furthermore, the antenna and power restrictions on the Family Radio Service are not particularly useful in 2025 and thus this service should be rolled into the regular General Mobile Radio Service as defined above.

In the same vein, regulations prohibiting the use of newer and spectrum-efficient digital voice technologies such as DMR are counterproductive under Part 95 and should be scrapped, along with the prohibition of basic encryption, at least on some channels, as individuals have an inherent need for privacy and security in their communications without needing to resort to burdensome commercial licensure, frequency coordination, or resorting to mobile phone infrastructure that may not be functioning in times of distress.

Doing the above would create a robust radio structure that would serve the interests of individuals, families, social groups, religious organizations, neighborhood watch, and small/medium size businesses that operate within relatively narrow geographic ranges that are defined by power limits and line of sight.

Implementation of these recommendations would fulfill the administration's mandate of reducing complex and unnecessary regulations without unduly burdening the Commission or negatively impacting existing or future users of the spectrum.

Respectfully submitted,

[1] https://wiki.radioreference.com/index.php/Common_Itinerant_and_Business

Peter J. Dougherty (FRN: 0006578728)